

EXHIBIT A

Re: In re: Manchanda Law Office PLLC (23-11805) [DRAFT]

Manchanda Law Office PLLC <info@manchanda-law.com>

Fri 12/29/2023 12:32 PM

To: Robert Guttman <RGuttman@zeklaw.com>

Cc: sl@lhmlawfirm.com <sl@lhmlawfirm.com>; Michael S. Davis <MDavis@zeklaw.com>; 12127530396@efaxsend.com <12127530396@efaxsend.com>; Ashley Slot <Ashley@l2ins.com>; Justin Norcross <Justin@l2ins.com>; Tracy Tyson <Tracy@l2ins.com>; Brady LaMaire <Brady@l2ins.com>

Mr Guttman:

Don't threaten me.

The contempt motion is due to your terminating our insurance policy, trying to collect a debt turned over to the bankruptcy trustee/estate, threats, harassment, and pre-petition debt collections activity, more than sufficient to justify a violation of 11 U.S.C. 362.

And if you ask for sanctions, we will also request Rule 11 sanctions for clearly frivolous vexatious litigation on your end.

Finally your law firm has been cc'ed on every communication with our broker Ashley Slot, as recently as 5 minutes ago, who is again cc'ed herein.

We will not pay \$11,000 plus for tail ERP with retroactive date 2016, but rather \$2-3000 maximum.

Failing that we will just see you in court.

Thanks,

Kind regards,

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Rahul D. Manchanda, Esq.
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Ranked amongst Top Immigration Attorneys in the United States by Newsweek Magazine in 2012 and Top Attorneys Nationwide in 2013.

Martindale Hubbell Client Champion 2017 Silver Award Winner, 2020 Gold Award Winner, 2020 Platinum Award Winner.

Better Business Bureau Accredited Business A+ Rating.

Association of American Trial Lawyers Top 100 In New York State.

Best Family Lawyers and Best Immigration Lawyers in New York City in 2022 as published on Expertise.com

U.S. News and World Report Listed Lawyer.

Licensed New York State Real Estate Broker.

CLIENT TESTIMONIALS: <https://manchanda-law.com/testimonials/>

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On Dec 29, 2023, at 12:21 PM, Robert Guttman <RGuttman@zeklaw.com> wrote:

Dear Attorney Manchanda,

I write in connection with the Motion for Contempt (the "Motion") filed against, *inter alia*, both my firm and my firm's client, IPFS Corp. This email is in furtherance of the message I left with your office this morning.

Please be advised that a filed Motion to Lift Stay does not and cannot constitute a violation of the automatic stay. Thus *your* Motion is palpably improper and violates FRBP 9011. We demand that you withdraw the Motion at once. **To the extent such withdrawal is not made expeditiously, we intend to move for sanctions under 9011.**

Your motion alleges that discussions took place between you and your firm's insurance broker to obtain tail coverage of the policy financed by IPFS. Please provide the contact information for said broker and authority for IPFS, and/or its counsel, to communicate with said broker. Please be advised that any negotiated resolution to IPF's Motion to Lift Stay will necessarily include the cure of the secured premium finance loan amounts in arrear as well as adequate assurance payments as detailed in said motion.

Be Guided Accordingly,

Robert Guttman, Esq.
Of Counsel



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